

O'HAGAN MEYER

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 11/19/19

ATTORNEYS & ADVISORS

Rachael L. Loughlin
Direct: 804.403.7114
RLoughlin@ohaganmeyer.com

November 19,

VIA ECF

Honorable Vincent L. Briccetti
United States District Court
Southern District of New York
Federal Building and United States Courthouse
300 Quarropas Street
White Plains, New York 10601-4150

Re: **Kervin Jeanty v. Precision Pipeline**
Civil Action No.: 7:18-cv-07721-VB

Dear Judge Briccetti:

This office represents Defendant, Precision Pipeline Solutions, LLC ("PPS"). Pursuant to Local Rule 37.2, as well as your Individual Rules of Practice, please accept this letter motion requesting a pre-motion discovery conference.

On September 10, 2019, PPS served Plaintiff, Kervin Jeanty ("Jeanty"), with its First Set of Interrogatories and Requests for Production of Documents. To date, Jeanty has failed to submit his Initial Disclosures pursuant to Fed. R. Civ. P. 26(a)(1) and failed to respond to any document request or interrogatory propounded in PPS First Set of Interrogatories and Request for Production of Documents. Counsel for PPS has conferred with Jeanty on two occasions by phone. During each call, Jeanty has asked for additional time, most recently confirming that he would provide the information and materials by close of business on November 5, 2019. As of the date of this letter, PPS has not received Jeanty's Initial Disclosures or his discovery responses. As such, PPS respectfully requests an informal conference with this Court to compel said information and materials. Specifically, PPS seeks to compel Jeanty's submission of his Initial Disclosures, his responses to Interrogatory numbers 1-6, and his responses to PPS's document requests.

Please also accept this letter motion as a Request by Counsel for PPS for leave to appear for the pre-motion conference via telephone in an attempt to decrease the cost to our client for travel to White Plains, New York for the conference.

By 12/3/2019, plaintiff shall respond in writing to this letter, at which time the Court will decide whether a conference is necessary. Plaintiff is advised that his pro se status does not excuse his obligation to comply with the discovery provisions of the Federal Rules as well as the Court's prior Orders. The Clerk is instructed to terminate the letter-motion (Doc. #44) and mail a copy of this Order to plaintiff at the address on the docket.

SO ORDERED.

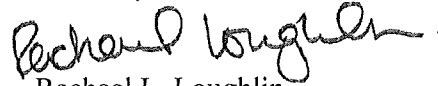


Vincent L. Briccetti, U.S.D.J., 11/19/2019

Civil Action No.: 7:18-cv-07721-VB
Page 2

Thank you for your consideration of our request. Please do not hesitate to contact me should you have any questions.

Sincerely,



Rachael L. Loughlin

RLL/mw

Cc: Kervin Jeanty (*via email and U.S. Mail*)
Charles G. Meyer, III, Esq.